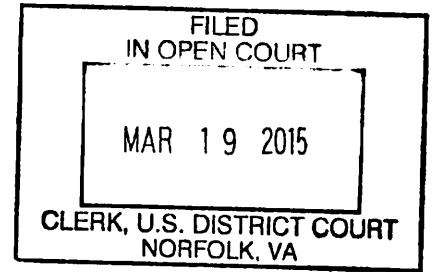


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 2:15cr 31
v.)	
)	18 U.S.C. § 513(a)
KATHERINE ALBERT-McNAUGHTON,)	Making, Uttering and Possessing
a/k/a Katherine Albert,)	Forged Security of an Organization
)	(Count 1)
Defendant.)	
)	18 U.S.C. § 1957
)	Engaging in Monetary Transactions in
)	Criminally Derived Property
)	(Counts 2 & 3)
)	
)	Forfeiture

INDICTMENT

MARCH 2015 TERM – at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

During the period from in or about October 2011 through June 2014, in the Eastern District of Virginia, KATHERINE ALBERT-McNAUGHTON, a/k/a Katherine Albert, the defendant, did knowingly make, utter and possess a forged security of HBA Architecture & Interior Design, Inc., an organization that operates in and the activities of which affect interstate commerce, with the intent to deceive another person and organization, in that the defendant forged the signature of a principal of HBA Architecture & Interior Design, Inc., on approximately eighty-three (83) checks of said organization totaling \$469,831.89, as listed below, and subsequently negotiated said checks and used the proceeds for unauthorized purposes.

DATE	CHECK#	CHECK AMOUNT
10/13/2011	41466	\$1,982.00
10/27/2011	41500	\$6,100.00
11/3/2011	41502	\$5,600.00
11/1/2011	41517	\$6,324.00
11/21/2011	41575	\$7,523.00
11/4/2011	41543	\$5,873.00
11/9/2011	41544	\$5,883.00
11/29/2011	41601	\$6,173.00
12/8/2011	41638	\$5,253.89
12/28/2011	41913	\$8,200.00
12/28/2011	41934	\$5,980.00
1/15/2012	41961	\$2,919.00
1/31/2012	41976	\$3,790.00
2/5/2012	41996	\$2,200.00
2/21/2012	42037	\$5,407.00
3/7/2012	42058	\$6,800.00
3/19/2012	42111	\$4,700.00
4/2/2012	42133	\$8,235.00
4/10/2012	42173	\$3,527.00
4/16/2012	42176	\$3,300.00
4/30/2012	42350	\$4,830.00
5/15/2012	42456	\$4,340.00
5/23/2012	42506	\$3,200.00
6/5/2012	42508	\$4,750.00
6/5/2012	42509	\$5,100.00
6/18/2012	42534	\$5,287.00
7/2/2012	42563	\$5,420.00
7/5/2012	42564	\$4,836.55
7/12/2012	42566	\$3,350.00
7/25/2012	42603	\$5,240.00
8/6/2012	42643	\$4,350.22
8/9/2012	42683	\$8,232.00
8/14/2012	42685	\$6,830.62
8/17/2012	42686	\$4,380.00
8/28/2012	42693	\$6,460.57
9/7/2012	42741	\$8,367.00
11/15/2012	42790	\$1,022.00
11/12/2012	42898	\$985.00

DATE	CHECK#	CHECK AMOUNT
11/19/2012	42923	\$1,232.18
11/16/2012	42924	\$768.00
11/26/2012	42962	\$1,232.45
11/28/2012	42964	\$1,300.00
12/4/2012	42976	\$1,782.36
12/11/2012	42995	\$1,433.00
12/18/2012	42996	\$1,382.00
12/21/2012	43025	\$1,892.00
1/2/2013	43050	\$6,500.00
1/4/2013	43052	\$6,188.00
1/15/2013	43110	\$2,240.00
1/21/2013	43111	\$7,250.00
1/22/2013	43112	\$9,587.39
1/29/2013	43137	\$9,855.00
1/29/2013	43136	\$8,237.00
4/4/2013	43359	\$8,250.00
4/8/2013	43361	\$9,783.00
4/30/2013	43381	\$8,452.38
5/3/2013	43603	\$9,785.00
6/12/2013	43703	\$8,782.00
6/20/2013	43736	\$9,874.32
7/8/2013	43748	\$9,937.00
7/8/2013	43766	\$9,987.00
8/14/2013	43854	\$9,523.00
8/19/2013	43883	\$7,254.00
8/26/2013	43884	\$9,874.00
9/24/2013	43973	\$4,852.00
10/10/2013	44031	\$6,857.00
10/24/2013	44082	\$6,287.00
11/5/2013	44114	\$4,283.00
11/22/2013	44145	\$5,275.32
12/5/2013	44173	\$4,352.35
12/19/2013	44207	\$4,785.00
12/30/2013	44223	\$4,987.00
1/14/2014	44291	\$4,578.00
1/31/2014	44341	\$3,978.00
3/3/2014	44429	\$5,297.00
3/17/2014	44467	\$5,871.00
4/1/2014	44514	\$6,287.00
4/15/2014	44548	\$8,742.00

DATE	CHECK#	CHECK AMOUNT
11/16/2012	44608	\$6,854.00
4/30/2014	44939	\$7,254.00
4/30/2014	44966	\$7,458.00
6/2/2014	45097	\$8,741.00
6/11/2014	45135	\$7,961.03

(In violation of Title 18, United States Code, Section 513(a).)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 17, 2012, in the Eastern District of Virginia, KATHERINE ALBERT-McNAUGHTON, a/k/a Katherine Albert, the defendant, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000.00 and which was derived from specified unlawful activity, namely, the making, uttering and possession of a forged security of an organization in violation of Title 18, United States Code, Section 513(a), in and affecting interstate commerce, that is, the wire transfer of \$13,000.00 from a USAA bank account controlled by the defendant to another bank account.

(In violation of Title 18, United States Code, Section 1957.)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 10, 2013, in the Eastern District of Virginia, KATHERINE ALBERT-McNAUGHTON, a/k/a Katherine Albert, the defendant, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000.00 and which was derived from specified unlawful activity, namely, the making, uttering and possession of a forged security of an organization in violation of Title 18, United States Code, Section 513(a), in and affecting interstate commerce, that is, the wire transfer of

\$15,000.00 from a Wells Fargo bank account controlled by the defendant to another bank account.

(In violation of Title 18, United States Code, Section 1957.)

FORFEITURE

1. The defendant, if convicted of the violation alleged in Count One of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
2. The defendant, if convicted of either of the violations alleged in Counts Two or Three of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, involved in the violation, and any property traceable to that property.
3. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).
4. The property subject to forfeiture includes, but is not limited to, the following property:
 - a. A sum of money of at least \$469,831.89, which is the total amount of gross proceeds of the offense charged in Count One. Said sum of money is subject to a monetary judgment in favor of the United States;

- b. The contents of HBA Architecture & Interior Design, Inc. Employee Stock Bonus Plan in the name of Katherine Albert-McNaughton (Date of Participation: 11/01/2004); and
- c. The contents of HBA Architecture & Interior Design, Inc. Employee Stock Bonus Plan in the name of Katherine Albert-McNaughton (Date of Participation: 05/01/2012).
- d. The contents of Wells Fargo account # 552196 6241 in the name of Katherine Albert-McNaughton.
- e. The contents of Wells Fargo account # 616516 1263 in the name of Katherine Albert-McNaughton.
- f. The contents of Wells Fargo account # 300020968 6303 in the name of Katherine Albert-McNaughton and Michael Lee McNaughton.
- g. The contents of Wells Fargo account # 101028632 3671 in the name of Katherine Albert-McNaughton and Michael Lee McNaughton.
- h. The contents of USAA account # 12081 2401 in the name of Katherine Albert-McNaughton and Michael Lee McNaughton.
- i. The contents of USAA account # 012081 2398 in the name of Katherine Albert-McNaughton and Michael Lee McNaughton.
- j. 2013 Jeep Wrangler, Vehicle Identification Number 1C4HJWEG9DL670854.

(In accordance with 18 U.S.C. § 981(a)(1)(C) by 28 U.S.C. § 2461; 18 U.S.C. § 982(a)(1).)

United States v. Katherine Albert-McNaughton
Criminal No. 2:15cr 31

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

A TRUE BILL:

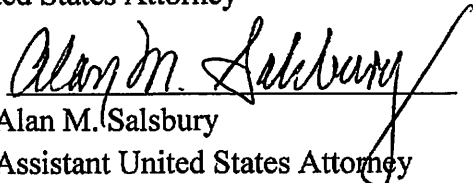
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FOREPERSON

Dana J. Boente
United States Attorney

Sealed Pursuant to the
E-Government Act of 2002

By:


Alan M. Salisbury
Assistant United States Attorney

101 West Main Street, Suite 8000
Norfolk, Virginia 23510

Tel. - 757-441-6350

Fax - 757-441-6689

Email - alan.salsbury@usdoj.gov